



Jan. 29, 2008

GULFCO MARINE MAINTENANCE SUPERFUND FACT SHEET

PRP ISSUE: The PRP group (Dow, Sequa, and LDL) at the Gulfco Marine Maintenance Superfund Site ("Site") wish to abandon conducting the RI/FS and to conduct all future response actions under removal authority, splitting the Site into a North and South Operable Units, and then place the South portion of the Site into reuse.

REGION 6 POSITION: The Region believes having the PRPs complete the RI/FS (75% done) is the best way to get the Site cleaned up and redeveloped as quickly as possible.

- The RI/FS needs to be completed to determine how to address the contamination at the Site and under what appropriate authority.
 - For example, groundwater contamination still needs to be delineated and additional sampling for the risk assessment needs to be determined.
 - EPA's cleanup path (by finishing the RI/FS) will address the PRPs goals by cleaning up the site quickly and placing the entire Site into productive reuse.

BACKGROUND: The Site, a former barge cleaning facility, is 40-acres and located along the Intracoastal Waterway in Freeport, Texas. Site contamination, including chlorinated solvents in ground water, resulted in a listing on the National Priorities List (NPL) effective in May 2003. In 2004, the EPA invited the PRP group to negotiate an Administrative Order on Consent for the RI/FS.

The PRPs declined to submit a good faith offer. For the next year, EPA attempted to negotiate the terms of an AOC for an RI/FS. The PRP group proposed that sampling and cleanup be done under the state Voluntary Cleanup Program. After talks failed on EPA's insistence that an RI/FS be conducted as part of any cleanup proposal, a Unilateral Administrative Order to perform the RI/FS was issued to the PRP Group on July 14, 2005. PRPS are about 75% complete with the RI/FS and are preparing risk assessments now along with final rounds of sampling

SAMPLING: Two investigation related issues remain as follows:

- Extent of ground water contamination: DNAPL is present in the two uppermost groundwater zones and it appears contamination may be present in the lower aquifer. More wells and sampling must occur to determine the extent of contamination. Fresh water aquifer is at 200-feet.
- Need for additional ecological sampling, which is being assessed now.
(The time necessary to complete the RI/FS depends on how many deeper water zones are contaminated, and the extent of ecological sampling required.)

COMMUNITY CONCERNS: The Gulfco Site is near a residential neighborhood, whose members have expressed concerns regarding exposure to site contamination. Also, an adjacent landowner wishes to develop his property for residential use, but is delaying any action pending the outcome of the site investigation.



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OSRE RECOMMENDATIONS: Complete the RI/FS before determining next steps.

The anticipated final remedy components in the ROD include:

- Removal of hazardous substances from tanks; Removal of buried drums/debris;
- Institutional controls; and Long-term ground water monitoring.

(Tank, drum & soil removal might be performed as a non-time critical removal, but pending the results of the risk assessments, a soil/sediment remedy may be necessary; and depending on the depth of ground water contamination and threat to fresh water aquifers, a more aggressive ground water remedy may be necessary.

- Thus, more time to gather information is needed to select the proper response action.

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